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FACEBOOK, INC. and
MARK ZUCKERBERG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE,

Plaintiff,

v.

FACEBOOK, INC., ET AL.,

Defendants.

Case No. 3:20-cv-05787-SI

**DECLARATION OF MOLLY M.
JENNINGS IN SUPPORT OF
DEFENDANTS FACEBOOK, INC.'S
AND MARK ZUCKERBERG'S
MOTION TO DISMISS**

1 I, Molly M. Jennings, declare:

2 1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, counsel
3 for Defendants (“Defendants”) Facebook, Inc. and Mark Zuckerberg in the above-captioned action. I
4 am a member in good standing of the Washington, D.C. Bar, and I am admitted *pro hac vice* to
5 appear before this Court. I submit this declaration in support of Defendants’ Motion to Dismiss.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Facebook for Business
7 “Fact Checking on Facebook” webpage, available at [https://www.facebook.com/business/help/](https://www.facebook.com/business/help/2593586717571940?id=673052479947730)
8 [2593586717571940?id=673052479947730](https://www.facebook.com/business/help/2593586717571940?id=673052479947730).

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Facebook’s “How Our
10 Fact-Checking Program Works” webpage, available at [https://www.facebook.com/journalism](https://www.facebook.com/journalismproject/programs/third-party-fact-checking/how-it-works)
11 [project/programs/third-party-fact-checking/how-it-works](https://www.facebook.com/journalismproject/programs/third-party-fact-checking/how-it-works).

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of Facebook’s “Combatting
13 Vaccine Misinformation” webpage, available at [https://about.fb.com/news/2019/03/combating-](https://about.fb.com/news/2019/03/combating-vaccine-misinformation/)
14 [vaccine-misinformation/](https://about.fb.com/news/2019/03/combating-vaccine-misinformation/).

15
16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on this 23rd day of October 2020 in Washington, D.C.

18
19 By: /s/ Molly M. Jennings
Molly M. Jennings

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: October 23, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta